

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

V.

DOCKET NO. 15-CR-00077-JL

JUAN PICHARDO MENDEZ

ASSENTED TO MOTION TO CONTINUE

NOW COMES the accused, Juan Pichardo Mendez, by and through counsel, Paul J. Garrity, and hereby moves this Court to continue his November 3, 2015 Trial to December 8, 2015.

In support of this Motion the accused states as follows:

1. The accused is scheduled for a Trial on November 3, 2015.
2. One of the issues at the accused's Trial may include the type of drug involved. The Government contends that it is crack cocaine. The accused has been attempting to gather funds to retain a chemist to analyze the Government's lab analyst notes and conclusions. The accused recently was successful in obtaining those funds and is awaiting the Government's analyst lab notes for the accused's expert to review. Given the import of this issue to the resolution of the accused's case, the accused submits that the requested period of continuance will allow his expert to successfully complete his analysis.
3. In addition, the accused is requesting the additional time to complete his investigation relative to the facts of the case and to properly prepare for the Trial.
4. Lastly, the parties initially were of the belief that the Trial would be finished prior to November 6, 2015. However, at this time, after discussing the issues involved in this

case, both parties are of the belief that the Trial may take longer than 4 (four) days . If the Trial were to last beyond November 6, 2015 the accused's counsel would be unavailable as he and his family are scheduled to fly to Florida on the evening on November 6, 2015 and will not be returning until November 15, 2015.

5. The Government assents to this Motion.

WHEREFORE, the accused respectfully requests that his Motion be granted and that his November 3, 2015 Trial be continued to December 8, 2015.

Respectfully submitted,
Juan Pichardo Mendez,
By His Attorney,

DATE: October 8, 2015

/s/ Paul J. Garrity_____
Paul J. Garrity
Bar #905
14 Londonderry Road
Londonderry, NH 03053
603-434-4106

CERTIFICATE OF SERVICE

I, Paul J. Garrity, hereby certify that on this 8th day of October, 2015 a copy of the within Assented Motion to Continue has be e-filed to the Assistant United States Attorney, Mark Zuckerman, and all parties of record and mailed, postage prepaid, to Juan Pichardo Mendez.

_____/s/ Paul J. Garrity_____